

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20090003
Agency Interest No. 92534

Mr. Tony Pontillas
Hexion Chemicals Company, Inc
PO Box 232
Geismar, LA 70734

RE: Part 70 Operating Permit Renewal/Modification, Hexion Specialty Chemicals Inc - Formaldehyde Plant
Hexion Specialty Chemicals Inc, Geismar, Ascension Parish, Louisiana.

Dear Mr. Pontillas:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2010.

Permit No.: 2019-V4

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:TVN
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Hexion Specialty Chemicals Inc - Formaldehyde Plant

Agency Interest No.: 92534

Hexion Specialty Chemicals Inc

Geismar, Ascension Parish, Louisiana

I. Background

Hexion Specialty Chemicals (Hexion) owns and operates five formaldehyde production units, a methanol tank farm, and loading/unloading operations for formaldehyde and methanol in Ascension Parish near the town of Geismar. Currently Formaldehyde Plants I, II, and III Plants, the methanol tank farm and barge loading operations operate under Permit No. 2019-V3, issued February 13, 2007.

II. Origin

A permit application was submitted by Hexion Specialty Chemicals, Inc on March 13, 2009 requesting a Part 70 operating permit renewal/modification. Additional information dated November 30, 2009 was also received.

III. Description

The Formaldehyde I Plant was built in 1976 and employs the Karl Fischer process developed by Borden Chemical. The design capacity of the plant is 375 million pounds per year (MM lb/yr) of 50% formaldehyde product.

The Formaldehyde II Plant was constructed in 1986 and is designed to produce 185 MM lb/yr of 50% formaldehyde product and 50 MM lb/yr of 85% urea/formaldehyde concentrate. The plant utilizes the metal oxide catalyst oxidation process (MO process) to produce formaldehyde.

The Formaldehyde III Plant was completely in 1990 and has a design capacity of 230 MM lb/yr of 50% formaldehyde product. The plant also utilizes the MO process to produce formaldehyde.

In this renewal/modification, Hexion requested the following:

- Include the T-Flare (Source ID No. 2009-01);
- Delete the General Flare (Source ID No. 21) and the Urea Plant Waste Incinerator (Source ID No. 80-6);
- Reconcile emission sources based on emission calculation methodologies and components counts; and
- Revise three Formaldehyde Product Tanks (EQT0015, EQT0018 and EQT0050) and Formaldehyde Rail/Truck Loading (EQT007) from Group 2 to Group 1 based on the determination resulted from data gathered during a recent investigation of the safety of operating processes at the facility.

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**Hexion Specialty Chemicals Inc
Geismar, Ascension Parish, Louisiana**

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	24.24	24.29	+0.05
SO ₂	0.12	0.11	-0.01
NOx	19.90	21.32	+1.42
CO	137.84	139.20	+1.36
VOC*	110.37	114.24	+3.87
H ₂ SO ₄	0.004	<0.01	-

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Formaldehyde	8.44	8.25	-0.19
Methanol	32.80	37.28	+4.48
Total VOC TAPs	41.24	45.53	+4.29
Other VOC	69.13	68.71	-0.42

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg.

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Hexion Specialty Chemicals Inc

Geismar, Ascension Parish, Louisiana

8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: ISC3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Formaldehyde	1997-2001	5.29 mg/m ³	7.69 mg/m ³

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**Hexion Specialty Chemicals Inc
Geismar, Ascension Parish, Louisiana**

VIII. General Condition XVII Activities

Work Activity	Emissions Rates-TPY	
	Formaldehyde	Methanol
Pump Maintenance	0.09	0.01
Instrument Maintenance	0.09	0.01
Safety Inspections – rupture disks	0.06	0.01
Startups and Shutdown	0.06	0.45
Preventative Maintenance	0.09	0.01
Scrubber Blowdowns		0.15
Filter Washing	0.12	0.01
Turnaround activities:		
Opening of off-line equipment	0.09	0.01
Equipment cleaning	0.12	0.01
Control device inspections	0.06	0.01
Miscellaneous equipment preparation	0.12	0.01
Vessel preparation	0.12	0.01
Catalyst recharging	0.06	0.01

IX. Insignificant Activities

ID No.:	Description	Citation
-	Two Diesel Tanks, 1000 gallons each	LAC 33:III.501.B.5.A.3.
-	X-9300 Caustic Storage Tank, 100 gallons	LAC 33:III.501.B.5.A.4.
-	Laboratory Vent, 60 samples/day	LAC 33:III.501.B.5.A.7
-	Non-commercial Water Washing Operations	LAC 33:III.501.B.5.A.8
-	Formaldehyde Rail Car Cleaning	LAC 33:III.501.B.5.D

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hexion Specialty Chemicals Inc - Formaldehyde Plant
Agency Interest No.: 92534
Hexion Specialty Chemicals Inc
Geismar Ascension Parish, Louisiana

X. **Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.	Description	LAC 33:II Chapter																
		5*	509	9	11	13	15	2103	2104*	2107	2111	2113	2116*	2122	22	29*	51*	53*
UNF0001	Formaldehyde I, II and III Plants & Methanol Tank Farm	1		1	1	1									1	1		1
EQT 0002	75-1 - Methanol Feed Tank 9003																	1
EQT 0003	75-2 - Recycle Methanol Feed Tank 9001																	1
EQT 0004	75-3 - Raw Formaldehyde Tank 9005																	1
EQT 0005	75-4 A - Formaldehyde Product Tank A 9201A																	1
EQT 0006	75-4 B - Formaldehyde Product Tank A 9201B																	1
EQT 0007	75-5 A - Formaldehyde Rail/Truck Loading																	1
EQT 0008	75-5 B - Methanol Rail/Truck Loading																	
EQT 0009	78-1 - Formaldehyde Product Tank 9002																	
EQT 0010	78-2 - Formaldehyde Blend Tank 9207																	1
EQT 0011	78-8 - Stom Water Storage Tank TK-9309																	1
EQT 0012	80-1 - Formaldehyde Blend Tank 9205																	1
EQT 0013	80-2 - Formaldehyde Blend Tank 9206																	1
EQT 0014	80-3 - Formaldehyde Blend Tank C 9204																	1
EQT 0015	80-4 - Formaldehyde Product Tank C 9208																	1
EQT 0017	85-01 - Off Gas Vent																	1
EQT 0018	85-02 - Formaldehyde Product Tank 9209																	1
EQT 0019	85-03 - Formaldehyde Product Tank 9201C																	1
EQT 0021	85-05 - Formaldehyde Storage Tank 9212																	1
EQT 0022	85-06 - Formaldehyde Storage Tank 9213																	1
EQT 0023	85-07 - Product Tank A 9304																	1
EQT 0024	85-08 - Product Tank B 9305																	1

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ID No.	Description	5*	509	9	11	13	15	203	2104*	2107	2111	2113	2116*	2122	22	29*	51*	53*	56	59*
EQT 0025	85-09 - Methanol Scrubber Water Tank 9302																			
EQT 0026	85-10 - Methanol Scrubber Water Tank 9303																			
EQT 0027	89-02 - Off Gas Vent	1																		
EQT 0028	95-23 - Wash Water Tank 9006																			
EQT 0029	95-26 - Cooling Tower CT-9103																			
EQT 0030	95-27 - Cooling Tower CT-9101																			
EQT 0031	95-28 - Cooling Tower CT-9102																			
EQT 0032	95-63 - Sulfuric Acid Tanks (2)																			
EQT 0033	95-64 - Formaldehyde Plant Sump																			
EOT 0034	4 - Storm Water Storage Tank TK-9308																			
EOT 0035	48 - Tank Farm - Methanol Storage Tanks Scrubber																			
EOT 0036	48(a) - Methanol Storage Tank 1901A																			
EOT 0037	48(b) - Methanol Storage Tank 1902B																			
EOT 0038	48(c) - Methanol Storage Tank 1903C																			
EOT 0039	48(d) - Methanol Storage Tank 1904D																			
EOT 0040	48(e) - Methanol Storage Tank 1905E																			
EOT 0041	48(f) - Methanol Storage Tank 1906F																			
EOT 0042	48(g) - Methanol Storage Tank 1908G																			
EOT 0043	29-C - Methanol Loading - Barge																			
EOT 0044	98-07 - Storm Water Storage Tank TK-9310																			
EOT 0045	98-08 - Storm Water Storage Tank TK-9307																			
EOT 0046	99-10 - Storm Water Storage Tank TK-9212																			
EOT 0047	99-11 - Storm Water Storage Tank TK-9213																			

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ID No.	Description	LAC 33:III. Chapter																		
		5*	509	9	11	13	15	2103	2104*	2107	2111	2113	2116*	2122	22	29*	51*	53*	56	59*
EQT 0048	2001-1 - Formaldehyde Storage Tanks Scrubber																			1
EQT 0049	2001-4 - Boiler									1										1
EQT 0050	2001-5 - Formaldehyde Product Tank D 9214																			1
EQT 0078	2007-01 - Formaldehyde Product Tank 9201D																			1
EQT 0079	2009-01 - T-Flare									1										1
EQT 0080	SAMPLING - Sampling Activities																			1
EQT 0081	INSPECTIONS - Safety Inspections - Tank Pressure, Vacuum Vents and Gauges																			1
EQT 0082	SUMPS - Removal of Solids from Sumps																			1
EQT 0083	WASHDOWN - Absorber, Column Washdown																			1
EQT 0084	ABSORBER - Absorber (Formaldehyde I Plant)																			1
FUG 0001	87-03 - Fugitive Emissions (Formaldehyde I Plant)																			1
FUG 0002	87-04 - Fugitive Emissions (Formaldehyde II Plant)																			1
FUG 0003	89-03 - Fugitive Emissions (Formaldehyde III Plant)																			1
FUG 0004	2001-2 - Fugitive Emissions (Tank Farm(s) & Other Sources)																			1

- * The regulations indicated above are State Only regulations
- ▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- | |
|---|
| - The regulations have applicable requirements that apply to this particular emission source. |
| ▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only. |
| - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements. |

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[2] - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
[3] - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
Blank - The regulations clearly do not apply to this type of emission source.

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR	
		A	K	Ka	Kb	D _b	D _c	GG	VV	III	A	FF	V	A	F	G	H	Y	64	68	
UNF0001	Formaldehyde I, II and III Plants & Methanol Tank Farm	1									1	1	1								1
EQT 0002	75-1 - Methanol Feed Tank 9003																				
EQT 0003	75-2 - Recycle Methanol Feed Tank 9001																				
EQT 0004	75-3 - Raw Formaldehyde Tank 9005																				
EQT 0005	75-4 A - Formaldehyde Product Tank A 9201A																				
EQT 0006	75-4 B - Formaldehyde Product Tank A 9201B																				
EQT 0007	75-5 A - Formaldehyde Rail/Truck Loading																				
EQT 0008	75-5 B - Methanol Rail/Truck Loading																				
EQT 0009	78-1 - Formaldehyde Product Tank 9002																				
EQT 0010	78-2 - Formaldehyde Blend Tank 9207																				
EQT 0011	78-8 - Storm Water Storage Tank TK-9309																				
EQT 0012	80-1 - Formaldehyde Blend Tank 9205																				
EQT 0013	80-2 - Formaldehyde Blend Tank 9206																				
EQT 0014	80-3 - Formaldehyde Blend Tank C 9204																				
EQT 0015	80-4 - Formaldehyde Product Tank C 9208																				
EQT 0017	85-01 - Off Gas Vent																				
EQT 0018	85-02 - Formaldehyde Product Tank 9209																				
EQT 0019	85-03 - Formaldehyde Product Tank 9201C																				

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ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR		
		A	K	Ka	Kb	Db	Dc	GG	VV	III	A	FF	V	A	F	G	H	Y	64	68		
EQT 0021	85-05 - Formaldehyde Storage Tank 9212																		1	1		
EQT 0022	85-06 - Formaldehyde Storage Tank 9213																		1	1		
EQT 0023	85-07 - Product Tank A 9304																		1	1		
EQT 0024	85-08 - Product Tank B 9305																		1	1		
EQT 0025	85-09 - Methanol Scrubber Water Tank 9302																		1	1		
EQT 0026	85-10 - Methanol Scrubber Water Tank 9303																		1	1		
EQT 0027	89-02 - Off Gas Vent																		1	1		
EQT 0028	95-23 - Wash Water Tank 9006																		1	1		
EQT 0029	95-26 - Cooling Tower CT-9103																		1	1		
EQT 0030	95-27 - Cooling Tower CT-9101																		1	1		
EQT 0031	95-28 - Cooling Tower CT-9102																		1	1		
EQT 0032	95-63 - Sulfuric Acid Tanks (2)																		1	1		
EQT 0033	95-64 - Formaldehyde Plant Sumps																		1	1		
EQT 0034	4 - Storm Water Storage Tank TK-9308																		1	1		
EQT 0035	48 - Tank Farm - Methanol Storage Tanks Scrubber																		1	1		
EQT 0036	48(a) - Methanol Storage Tank 1901A																		1	1		
EQT 0037	48(b) - Methanol Storage Tank 1902B																		1	1		
EQT 0038	48(c) - Methanol Storage Tank 1903C																		1	1		
EQT 0039	48(d) - Methanol Storage Tank 1904D																		1	1		
EQT 0040	48(e) - Methanol Storage Tank 1905E																		1	1		
EQT 0041	48(f) - Methanol Storage Tank 1906F																		1	1		
EQT 0042	48(g) - Methanol Storage Tank 1908G																		1	1		
EQT 0043	29-C - Methanol Loading - Barge																		1	1		

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		A	K	Ka	Kb	Dc	Db	GC	VW	III	A	FF	V	A	F	G	H	Y	64	68	
EQT 0044	98-07 - Storm Water Storage Tank TK-9310																				
EQT 0045	98-08 - Storm Water Storage Tank TK-9307																				
EQT 0046	99-10 - Storm Water Storage Tank TK-9212																				
EQT 0047	99-11 - Storm Water Storage Tank TK-9213																				
EQT 0048	2001-1 - Formaldehyde Storage Tanks Scrubber	1																			
EQT 0049	2001-4 - Boiler	1	1															1	1		
EQT 0050	2001-5 - Formaldehyde Product Tank D 9214																				
EQT 0078	2007-01 - Formaldehyde Product Tank 9201D																			1	1
EQT 0079	2009-01 - T-Flare																	1	1	1	
EQT 0080	SAMPLING - Sampling Activities																				
EQT 0081	INSPECTIONS - Safety Inspections - Tank Pressure, Vacuum Vents and Gauges																				
EQT 0082	SUMPS - Removal of Solids from Sumps																				
EQT 0083	WASHDOWN - Absorber Column Washdown																				
EQT 0084	ABSORBER - Absorber (Formaldehyde I Plant)																	1			
FUG 0001	87-03 - Fugitive Emissions (Formaldehyde I Plant)	1																1	1		
FUG 0002	87-04 - Fugitive Emissions (Formaldehyde II Plant)	1																1	1		
FUG 0003	89-03 - Fugitive Emissions (Formaldehyde III Plant)	1																1	1		
FUG 0004	2001-2 - Fugitive Emissions (Tan k Farm(s) & Other Sources)	1																1	1		

KEY TO MATRIX

¹ - The regulations have applicable requirements that apply to this particular emission source.

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- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion. Such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source
- Blank – The regulations clearly do not apply to this type of emission source**

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT049	LAC 33:III:Chapter 1 ⁵ Emission Standards for Sulfur Dioxide	DOES NOT APPLY as per LAC 33.III.1502.A.3, SO ₂ < 5 TPY

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

General Information

AI ID: 1409 Dow Chemical Co - Louisiana Division
Activity Number: PER20090027
Permit Number: 2024-V4
Air - Title V Regular Permit Minor Mod

Also Known As:	ID	Name	User Group	Start Date
	1280-00008	Dow Chemical Co - Louisiana Division	CDS Number	05-27-1993
38-1285128		Federal Tax ID	Federal Tax ID	11-21-1999
LAD008187080		Dow Chemical Co LA Operations	Hazardous Waste Notification	01-29-1986
PMT/CA		GPRA Baselines	Hazardous Waste Permitting	10-01-1997
1280-00008		Dow Chemical Co - Louisiana Division	Historic Emission Inventory System (EIS) ID	03-03-2004
1280-00008		Historic Toxic Emissions Data Inventory (TEDI) ID	Historic Toxic Emissions Data Inventory (TEDI) ID	01-01-1991
00290		Dow Chemical	Inactive & Abandoned Sites	09-01-1986
LAD008187080		Dow Chemical USA	Inactive & Abandoned Sites	06-09-1981
LA0003301		LPDES #	LPDES Permit #	05-27-1993
LAR05N128		LPDES #	LPDES Permit #	10-24-2001
LAR10B702		LPDES #	LPDES Permit #	03-24-2003
LAR10C623		LPDES #	LPDES Permit #	10-28-2004
LAR10D056		LPDES #	LPDES Permit #	06-13-2005
LAR10D101		LPDES #	LPDES Permit #	08-23-2005
LAR10D431		LPDES Permit #	LPDES Permit #	04-01-2006
GP1596		LWDPS #	LWDPS Permit #	11-21-1999
WP1561		LWDPS #	LWDPS Permit #	06-25-2003
WP1654		LWDPS #	LWDPS Permit #	06-25-2003
		Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
		Radioactive Material License	Radiation License Number	03-12-2001
		X-Ray Registration Number	Radiation X-ray Registration Number	11-21-1999
		Site ID #	Solid Waste Facility No.	04-30-2001
	1280A0002	Stage II Vapor Recovery	Stage II Vapor Recovery	08-19-2002
GPD-041-0107		Dow Chemical USA	TEMPO Merge	05-22-2001
2002		Dow Chemical Co - Vinyl II Cooling Tower	TEMPO Merge	12-19-2005
11649		Dow Chemical USA - LA Division New Tank Farm	TEMPO Merge	07-01-2001
126305		Dow Chemical Co - LA Operations	TEMPO Merge	05-22-2001
19794		Dow Chemical Co	TEMPO Merge	05-22-2001
38771		Dow Lighthouse Rd	TEMPO Merge	08-25-2002
41283		Dow Chemical USA	TEMPO Merge	05-22-2001
44749		Dow Chemical USA - Coal Gasification	TEMPO Merge	05-22-2001
44946		TRI #	Toxic Release Inventory	07-08-2004
52295				
70765THDWCHIGHW				

General Information

AI ID: 1409 Dow Chemical Co - Louisiana Division
Activity Number: PER20090027
Permit Number: 2024-V4
Air - Title V Regular Permit Minor Mod

Also Known As:	ID	Name	UST Facility ID #	User Group	Start Date
	24-011629	21255 Hwy 1 Plaquemine, LA 70765			10-11-2002
Physical Location:		PO Box 150 Plaquemine, LA 707650150			
Mailing Address:		30.313611 latitude, -91.240381 longitude, Coordinate Method: Lat,Long. - DMS, Coordinate Datum: NAD83			
Location of Front Gate:					
Related People:		Name	Mailing Address	Phone (Type)	Relationship
	Catherine Bilello	PO Box 150 Plaquemine, LA 707650150	2253536595 (WP)	Responsible Official for	
	Robert Brandt	PO Box 150 Plaquemine, LA 707650150	2253538938 (WP)	Responsible Official for	
	Bob Brandt	PO Box 150 Plaquemine, LA 707650150	2253538938 (WP)	Responsible Official for	
	Dan Bucholtz	PO Box 150 Plaquemine, LA 707650150	2253535802 (WP)	Responsible Official for	
	Mike Christal	PO Box 150 Plaquemine, LA 707650150	2253531660 (WP)	Responsible Official for	
	Delia Contreras	PO Box 150 Plaquemine, LA 707650150	2253536192 (WP)	Responsible Official for	
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	22535336128 (WP)	Stage II Vapor Recovery Billing Party for	
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	2253536128 (WP)	Solid Waste Billing Party for	
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	2253536128 (WP)	Accident Prevention Billing Party for	
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	2253536128 (WP)	Water Billing Party for	
	Bart Dolezal	PO Box 150 Plaquemine, LA 707650150	2253536039 (WP)	Responsible Official for	
	Ivy Dupree	21255 Hwy 1 S Plaquemine, LA 70765	2253531630 (WP)	Remediation Contact for	
	Richard Durham	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150		Underground Storage Tank Contact for	
	Richard Durham	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150		Hazardous Waste Permit Contact For	
	Tim Gunn	PO Box 150 Plaquemine, LA 707650150	2253531514 (WP)	Responsible Official for	
	Dan Jason	PO Box 150 Plaquemine, LA 707650150	2253631512 (WP)	Responsible Official for	
	Gretchen LeBlanc	PO Box 150 Plaquemine, LA 707650150	2253531642 (WP)	Responsible Official for	
	Craig Leopard	PO Box 150 Plaquemine, LA 707650150	2253535871 (WP)	Responsible Official for	
	Donald Lyle	PO Box 150 Plaquemine, LA 707650150	2253536472 (WP)	Responsible Official for	
	Vic McMurray	PO Box 150 Plaquemine, LA 707650150	2253536148 (WP)	Responsible Official for	
	William Nipper	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	22535338116 (WP)	Emission Inventory Contact for	
	William Nipper	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	wnipper@dow.com	Emission Inventory Contact for	
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253226146 (DP)	Radiation Contact For	
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253226146 (DP)	Radiation Safety Officer for	
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253538001 (WF)	Radiation Safety Officer for	
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	BRABALAIS@DOW.	Radiation Safety Officer for	
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	BRABALAIS@DOW.	Radiation Contact For	
	Brad Rabais		2253538001 (WF)	Radiation Contact For	

General Information

All ID: 1409 Dow Chemical Co - Louisiana Division
 Activity Number: PER20090027
 Permit Number: 2024-V4
 Air - Title V Regular Permit Minor Mod

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Brad Rabalais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253536146 (WP)	Radiation Contact For
	Brad Rabalais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253536146 (WP)	Radiation Safety Officer for
	Chris Reed	PO Box 150 Plaquemine, LA 707650150	2253538948 (WP)	Responsible Official for
	Lee Trusty	PO Box 150 Plaquemine, LA 707650150		Responsible Official for
	Gill Walker	PO Box 150 Plaquemine, LA 707650150		Responsible Official for
	Susan Williams	PO Box 150 Plaquemine, LA 707650150	2253535317 (WP)	Responsible Official for
	David Wilson	PO Box 150 Plaquemine, LA 707650150	2253536563 (WP)	Responsible Official for
Related Organizations:	Name	Address	Phone (Type)	Relationship
	JE Merit Constructors Inc	4949 Essen Ln Baton Rouge, LA 70898	2257685548 (WP)	Provides environmental services for
	National Maintenance Corp	2865 Mason St Baton Rouge, LA 70865		Provides environmental services for
	Petrin Corp	1405 Commercial Dr Port Allen, LA 70767		Provides environmental services for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Radiation Registration Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Air Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Air Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Radiation License Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	UST Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Emission Inventory Billing Party
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Radiation Registration Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Owns
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Owns
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Radiation License Billing Party for
NAIC Codes:	32519, Other Basic Organic Chemical Manufacturing			

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit.
 Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@lafgov.

INVENTORIES

AI ID: 1409 - Dow Chemical Co - Louisiana Division
 Activity Number: PER20090027
 Permit Number: 2024-V4
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Light Hydrocarbons III						
EQT 0663	6B - Tank T-100	4.87 million gallons				8760 hr/yr
EQT 0664	6C - Tank T-101	6.2 million gallons				8760 hr/yr
EQT 0665	6P - Tank T-1601-B1	261000 gallons				8760 hr/yr
EQT 0666	84 - HRU-1A		1326 MM BTU/hr	1105 MM BTU/hr		8760 hr/yr
EQT 0667	85 - HRU-1B		1326 MM BTU/hr	1105 MM BTU/hr		8760 hr/yr
EQT 0668	88 - Hydroreheater Furnace F-621		30 MM BTU/hr	25 MM BTU/hr		8760 hr/yr
EQT 0669	89 - Reactor Furnace F-523		150 MM BTU/hr	125 MM BTU/hr		8760 hr/yr
EQT 0670	88 - Tank T-1600	4.6 million gallons				8760 hr/yr
EQT 0671	8C - Tank T-1601-A	434530 gallons				8760 hr/yr
EQT 0672	8E - Tank T-1602	2.1 million gallons				8760 hr/yr
EQT 0673	8F - Tank T-1605A	470000 gallons				8760 hr/yr
EQT 0674	8G - Tank T-1605B	470000 gallons				8760 hr/yr
EQT 0675	8H - Tank T-1700	11.3 million gallons				8760 hr/yr
EQT 0676	8I - Tank T-1701	4.6 million gallons				8760 hr/yr
EQT 0677	8J - Tank T-1702A	2.1 million gallons				8760 hr/yr
EQT 0678	8K - Tank T-1702B	2.1 million gallons				8760 hr/yr
EQT 0679	8Q - Tank T-1705	2.5 million gallons				8760 hr/yr
EQT 0680	8R - Tank T-1720	2.35 million gallons				8760 hr/yr
EQT 0681	90 - Hydrogen Furnace F-520		150 MM BTU/hr	125 MM BTU/hr		8760 hr/yr
EQT 0682	91 - Furnace F-13		384 MM BTU/hr	320 MM BTU/hr		8760 hr/yr
EQT 0683	9R - Tank T-1700B	9.3 million gallons				8760 hr/yr
EQT 0684	A0(1) - Tank T-50	1980 gallons				8760 hr/yr
EQT 0685	A0(2) - Tank T-1610	11750 gallons				8760 hr/yr
EQT 0686	A0(3) - Tank T-1650	16919 gallons				8760 hr/yr
EQT 0687	FA - Flare FS-1					8760 hr/yr
EQT 0688	FB - Flare FS-1700		4 million gallons			8760 hr/yr
EQT 0690	HX - Tank T-1706A		4 million gallons			8760 hr/yr
EQT 0691	HY - Tank T-1706B		900000 gallons			8760 hr/yr
EQT 0692	IA - Tank T-1640		6.3 million gallons			8760 hr/yr
EQT 0693	IW - Tank T-1660					8760 hr/yr
EQT 0694	LF - Dock #2 Equipment Openings					8760 hr/yr
EQT 0695	LH - Dock #2 Loading Vapor Recovery		4000 gallons/min			8760 hr/yr
EQT 0696	MR - Cooling Tower CT-2000					8760 hr/yr
EQT 0697	SD - Start-up/Shutdown activities - FS-1					8760 hr/yr
EQT 0698	X9 - Lab Hoods					8760 hr/yr
EQT 0699	XB - Cooling Tower CT-1000					8760 hr/yr

INVENTORIES

AI ID: 1409 - Dow Chemical Co - Louisiana Division
 Activity Number: PER20090027
 Permit Number: 2024-V4
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Light Hydrocarbons III						
EOT 0700	ZB - Dock #2 Cracker feedstock Open Dome Loading	100 MM lbs/yr				8760 hr/yr
EOT 0701	ZD - Dock #2 Resin Oil Open Dome Loading	216 MM lbs/yr				8760 hr/yr
EOT 0702	ZE - Dock #2 Fuel Oil Open Dome Loading	545 MM lbs/yr				8760 hr/yr
EOT 0703	ZF - Dock #2 Toluene Open Dome Loading	4.5 MM lbs/yr				8760 hr/yr
EOT 0704	ZG - Dock #2 TX Open Dome Loading	330 MM lbs/yr				8760 hr/yr
EOT 0720	F-1 - Furnace					8760 hr/yr
EOT 0721	F-2 - Furnace					8760 hr/yr
EOT 0722	F-3 - Furnace					8760 hr/yr
EOT 0723	F-4 - Furnace					8760 hr/yr
EOT 0724	F-5 - Furnace					8760 hr/yr
EOT 0725	F-6 - Furnace					8760 hr/yr
EOT 0726	F-7 - Furnace					8760 hr/yr
EOT 0727	F-8 - Furnace					8760 hr/yr
EOT 0728	F-9 - Furnace					8760 hr/yr
EOT 0729	F-10 - Furnace					8760 hr/yr
EOT 0730	F-11 - Furnace					8760 hr/yr
EOT 0731	F-12 - Furnace					8760 hr/yr
EOT 0732	C-450 - Distillation Column Vent C-450					8760 hr/yr
EOT 0733	C-500 - Distillation Column Vent C-500					8760 hr/yr
EOT 0734	C-560 - Distillation Column Vent C-560					8760 hr/yr
EOT 0735	C-660 - Distillation Column Vent C-660					8760 hr/yr
EOT 0736	C-505A - Distillation Column Vent C-505A					8760 hr/yr
EOT 0737	C-510 - Distillation Column Vent C-510					8760 hr/yr
EOT 0738	C-600A - Distillation Column Vent C-600A					8760 hr/yr
EOT 0739	C-552 - Distillation Column Vent C-552					8760 hr/yr
EOT 0740	C-1660 - Distillation Column Vent C-1660					8760 hr/yr
EOT 0741	C-53 - Distillation Column Vent C-53					8760 hr/yr
EOT 0742	D-510 - Equipment Vent D-570A					8760 hr/yr
EOT 0743	D-570 - Equipment Vent D-570A					8760 hr/yr
EOT 0744	D-674 - Equipment Vent D-674					8760 hr/yr
EOT 0745	D-1603D - Equipment Vent D-1603CD					8760 hr/yr
EOT 0746	D-1603E - Equipment Vent D-1603E					8760 hr/yr
EOT 0747	- Resin Oil Tank Car Loading - Block 58					8760 hr/yr
EOT 0748	T-682 - Tank T-682					8760 hr/yr
EOT 0749	K-622 - Seal Purge K-622					8760 hr/yr
EOT 0750	Catalyst Test Unit - Catalyst Test Unit					8760 hr/yr
EOT 0751	Tank 1703A - Tank 1703A					8760 hr/yr
EOT 0752	Tank 1703B - Tank 1703B					8760 hr/yr
EOT 0753	Tank 1704A - Tank 1704A					8760 hr/yr

INVENTORIES

AI ID: 1409 - Dow Chemical Co - Louisiana Division
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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Light Hydrocarbons III						
EQT 0754	Tank 1704B - Tank 1704B					8760 hr/yr
EQT 0755	Tank 1704C - Tank 1704C					8760 hr/yr
EQT 0756	D-3 - Equipment Vent D-3					8760 hr/yr
EQT 0757	D-4 - Equipment Vent D-4					8760 hr/yr
EQT 0758	- C5s Loading					8760 hr/yr
EQT 0759	Tank V-802 - Tank V-802					8760 hr/yr
EQT 0760	Y-802A/B - Y-802A/B - Octene Molecular Sieve					8760 hr/yr
EQT 0761	FA - WW - FA - WW					8760 hr/yr
EQT 0837	- Biphenyl Tank Car Loading					8760 hr/yr
FUG 0016	FC - Fugitive Emission from Equipment Leaks					8760 hr/yr
FUG 0018	FC - Fugitive Emission from Equipment Leaks					8760 hr/yr
(None Specified)						
Stack Information:						
ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)
Light Hydrocarbons III						
EQT 0663	6B - Tank T-100			130		49
EQT 0664	6C - Tank T-101			148		48
EQT 0665	6P - Tank T-1601-B1			43		24
EQT 0666	84 - HRU-1A			76.3	517500	120
EQT 0667	85 - HRU-1B			76.3	517500	120
EQT 0668	88 - Hydrotreater Furnace F-621			16250	2.8	80
EQT 0659	89 - Reactor Furnace F-523		50000	5.8		190
EQT 0670	BB - Tank T-1600			128		48
EQT 0671	BC - Tank T-1601A			43		40
EQT 0672	8E - Tank T-1602			86		48
EQT 0673	8F - Tank T-1605A			50		32
EQT 0674	8G - Tank T-1609B			50		32
EQT 0675	8H - Tank T-1700			200		48
EQT 0676	8I - Tank T-1701			128		48
EQT 0677	8J - Tank T-1702A			86		48
EQT 0678	8K - Tank T-1702B			86		48
EQT 0679	8Q - Tank T-1705			94		48
EQT 0680	8R - Tank T-1720			100		40
						75

INVENTORIES

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Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
Light Hydrocarbons II							
EOT 0681	90 - Hydrogen Furnace F-520	50000	5.8	10	190	380	
EOT 0682	91 - Furnace F-13	50	199	40	173	300	
EOT 0683	9R - Tank T-1700B		6	20	20	78	
EOT 0684	A0(1) - Tank T-50		10	20	20	78	
EOT 0685	A0(2) - Tank T-1610		12	20	20	78	
EOT 0686	A0(3) - Tank T-1650		5.5	200	200	1200	
EOT 0687	FA - Flare FS-1		1.3	49	49	1000	
EOT 0688	FB - Flare FS-1700		130	40	40	80	
EOT 0690	HX - Tank T-1706A		130	40	40	80	
EOT 0691	HY - Tank T-1706B		60	40	40	75	
EOT 0692	IA - Tank T-1640		165	40	40	75	
EOT 0693	IW - Tank T-1660		1	40	40	40	
EOT 0695	LH - Dock #2 Loading Vapor Recovery						
EOT 0696	MR - Cooling Tower CT-2000					40	
EOT 0697	SD - Start-up/Shutdown activities FS-1		5.5	200	200	1200	
EOT 0698	X9 - Lab Hoods				20	78	
EOT 0699	XB - Cooling Tower CT-1000				40	40	

Relationships:

ID	Description	Relationship	ID	Description
EOT 0720	F-1 - Furnace	Vents to	EOT 0666	B4 - HRU-1A
EOT 0721	F-2 - Furnace	Vents to	EOT 0666	B4 - HRU-1A
EOT 0722	F-3 - Furnace	Vents to	EOT 0666	B4 - HRU-1A
EOT 0723	F-4 - Furnace	Vents to	EOT 0666	B4 - HRU-1A
EOT 0724	F-5 - Furnace	Vents to	EOT 0666	B4 - HRU-1A
EOT 0725	F-6 - Furnace	Vents to	EOT 0666	B4 - HRU-1A
EOT 0726	F-7 - Furnace	Vents to	EOT 0667	B5 - HRU-1B
EOT 0727	F-8 - Furnace	Vents to	EOT 0667	B5 - HRU-1B
EOT 0728	F-9 - Furnace	Vents to	EOT 0667	B5 - HRU-1B
EOT 0729	F-10 - Furnace	Vents to	EOT 0667	B5 - HRU-1B
EOT 0730	F-11 - Furnace	Vents to	EOT 0667	B5 - HRU-1B
EOT 0731	F-12 - Furnace	Vents to	EOT 0667	B5 - HRU-1B
EOT 0732	C-450 - Distillation Column Vent C-450	Vents to	EOT 0687	FA - Flare FS-1
EOT 0733	C-500 - Distillation Column Vent C-500	Vents to	EOT 0687	FA - Flare FS-1

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Relationships:

ID	Description	Relationship	ID	Description
EQT 0734	C-560 - Distillation Column Vent C-560	Vents to	EQT 0687	FA - Flare FS-1
EQT 0735	C-660 - Distillation Column Vent C-660	Vents to	EQT 0687	FA - Flare FS-1
EQT 0736	C-505A - Distillation Column Vent C-505A	Vents to	EQT 0687	FA - Flare FS-1
EQT 0737	C-510 - Distillation Column Vent C-510	Vents to	EQT 0687	FA - Flare FS-1
EQT 0738	C-600A - Distillation Column Vent C-600A	Vents to	EQT 0687	FA - Flare FS-1
EQT 0739	C-552 - Distillation Column Vent C-552	Vents to	EQT 0687	FA - Flare FS-1
EQT 0740	C-1660 - Distillation Column Vent C-1660	Vents to	EQT 0687	FA - Flare FS-1
EQT 0741	C-53 - Distillation Column Vent C-53	Vents to	EQT 0687	FA - Flare FS-1
EQT 0742	D-570 - Equipment Vent D-570A	Vents to	EQT 0687	FA - Flare FS-1
EQT 0743	D-570 - Equipment Vent D-570A	Vents to	EQT 0687	FA - Flare FS-1
EQT 0744	D-674 - Equipment Vent D-674	Vents to	EQT 0687	FA - Flare FS-1
EQT 0745	D-1603D - Equipment Vent D-1603C/D	Vents to	EQT 0687	FA - Flare FS-1
EQT 0746	D-1603E - Equipment Vent D-1603E	Vents to	EQT 0687	FA - Flare FS-1
EQT 0747	- Resin Oil Tank Car Loading - Block 58	Vents to	EQT 0687	FA - Flare FS-1
EQT 0749	K-622 - Seal Purge K-622	Vents to	EQT 0687	FA - Flare FS-1
EQT 0750	Catalyst Test Unit - Catalyst Test Unit	Vents to	EQT 0687	FA - Flare FS-1
EQT 0751	Tank 1703A - Tank 1703A	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0752	Tank 1703B - Tank 1703B	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0753	Tank 1704A - Tank 1704A	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0754	Tank 1704B - Tank 1704B	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0755	Tank 1704C - Tank 1704C	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0756	D-3 - Equipment Vent D-3	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0757	D-4 - Equipment Vent D-4	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0758	- C5s Loading	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0759	Tank V-802 - Tank V-802	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0760	Y-802AB - Y-802AB - Octene Molecular Sieve	Vents to	EQT 0688	FB - Flare FS-1700
EQT 0837	- Biphenyl Tank Car Loading	Vents to	EQT 0687	FA - Flare FS-1

Subject Item Groups:

ID	Group Type	Group Description
CRG 0041	Common Requirements Group	- Furnaces F-1 through F-12
CRG 0042	Common Requirements Group	- Distillation Column Vents
CRG 0043	Common Requirements Group	- Tanks T-1703A and T-1703B
CRG 0044	Common Requirements Group	- Tanks T-1704A, T-1704B, and T-1704C
CRG 0045	Common Requirements Group	- Tanks 6B, 6P, and 8C
CRG 0046	Common Requirements Group	- Tanks 6C, 8E, and 8I

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Subject Item Groups:

ID	Group Type	Group Description
CRG 0047	Common Requirements Group	Tanks 8B, 8H, and 9R
CRG 0048	Common Requirements Group	Tanks 8F and 8G
CRG 0049	Common Requirements Group	Tanks 8J, 8K, 8Q, and 8R
CRG 0050	Common Requirements Group	Tanks HX and HY
CRG 0051	Common Requirements Group	D-580,D-674, K-622, and Catalyst Test Unit
GRP 0085	Equipment Group	SLM - Plantwide SO2 Cap
GRP 0111	Equipment Group	Furnaces F-520 and F-523
UNF 0011	Unit or Facility Wide	Light Hydrocarbons III

Group Membership:

ID	Description	Member of Groups
EQT 0663	6B - Tank T-100	CRG00000000046
EQT 0664	6C - Tank T-101	CRG00000000046
EQT 0665	6P - Tank T-1601-B1	CRG00000000045
EQT 0666	84 - HRU-1A	GRP00000000085
EQT 0667	85 - HRU-1B	GRP00000000085
EQT 0669	89 - Reactor Furnace F-523	GRP00000000085, GRP00000000111
EQT 0670	8B - Tank T-1600	CRG00000000047
EQT 0671	8C - Tank T-1601A	CRG00000000045
EQT 0672	8E - Tank T-1602	CRG00000000046
EQT 0673	8F - Tank T-1605A	CRG00000000048
EQT 0674	8G - Tank T-1605B	CRG00000000048
EQT 0675	8H - Tank T-1700	CRG00000000047
EQT 0676	8I - Tank T-1701	CRG00000000046
EQT 0677	8J - Tank T-1702A	CRG00000000049
EQT 0678	8K - Tank T-1702B	CRG00000000049
EQT 0679	8Q - Tank T-1705	CRG00000000049
EQT 0680	8R - Tank T-1720	CRG00000000049
EQT 0681	90 - Hydrogen Furnace F-520	GRP00000000085, GRP00000000111
EQT 0682	91 - Furnace F-13	GRP00000000085
EQT 0683	9R - Tank T-1700B	CRG00000000047
EQT 0690	HX - Tank T-1705A	CRG00000000050
EQT 0691	HY - Tank T-1705B	CRG00000000050
EQT 0720	F-1 - Furnace	CRG00000000041
EQT 0721	F-2 - Furnace	CRG00000000041
EQT 0722	F-3 - Furnace	CRG00000000041
EQT 0723	F-4 - Furnace	CRG00000000041
EQT 0724	F-5 - Furnace	CRG00000000041
EQT 0725	F-6 - Furnace	CRG00000000041

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Group Membership:

Group Membership:		Description	Member of Groups
ID			
EQT 0726	F-7 - Furnace		CRG00000000041
EQT 0727	F-8 - Furnace		CRG00000000041
EQT 0728	F-9 - Furnace		CRG00000000041
EQT 0729	F-10 - Furnace		CRG00000000041
EQT 0730	F-11 - Furnace		CRG00000000041
EQT 0731	F-12 - Furnace		CRG00000000041
EQT 0732	C-450 - Distillation Column Vent C-450		CRG00000000042
EQT 0733	C-500 - Distillation Column Vent C-500		CRG00000000042
EQT 0734	C-560 - Distillation Column Vent C-560		CRG00000000042
EQT 0735	C-660 - Distillation Column Vent C-660		CRG00000000042
EQT 0736	C-505A - Distillation Column Vent C-505A		CRG00000000042
EQT 0737	C-510 - Distillation Column Vent C-510		CRG00000000042
EQT 0738	C-600A - Distillation Column Vent C-600A		CRG00000000042
EQT 0743	D-570 - Equipment Vent D-570A		CRG00000000051
EQT 0744	D-674 - Equipment Vent D-674		CRG00000000051
EQT 0749	K-622 - Seal Purge K-622		CRG00000000051
EQT 0750	Catalyst Test Unit - Catalyst Test Unit		CRG00000000051
EQT 0751	Tank 1703A - Tank 1703A		CRG00000000043
EQT 0752	Tank 1703B - Tank 1703B		CRG00000000043
EQT 0753	Tank 1704A - Tank 1704A		CRG00000000044
EQT 0754	Tank 1704B - Tank 1704B		CRG00000000044
EQT 0755	Tank 1704C - Tank 1704C		CRG00000000044

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multipiler	Units Of Measure
1710	1710 Negotiated Fee	366647	\$ New App
1350	1350 C) Petroleum, Chemical Bulk Storage and Terminal (500,001 - 1,000,000 BBL Capacity)		

SIC Codes:

2869	Industrial organic chemicals, nec	UNF 011
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 92534 - Hexlon Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Formaldehyde I, II, III Plants & Methanol Tank Farm															
EQT 0002 75-1										0.01			<0.01		
EQT 0003 75-2										0.01			<0.01		
EQT 0007 75-5-A										0.21	1.09	0.94			
EQT 0008 75-5-B										0.20	2.11	0.90			
EQT 0011 76-4										0.12			0.52		
EQT 0017 65-01	8.36	10.04	36.63							7.23	8.68	31.68			
EQT 0025 65-09										<0.01			0.01		
EQT 0026 65-10										<0.01			0.01		
EQT 0027 69-02	16.73	20.07	73.26							7.32	8.79	32.07			
EQT 0029 95-26							1.72	1.72	7.54			0.36	0.36	1.58	
EQT 0030 95-27							1.70	1.70	7.45			0.36	0.36	1.56	
EQT 0031 95-28							1.70	1.70	7.45			0.36	0.36	1.56	
EQT 0033 95-44												0.09	0.09	0.38	
EQT 0034 4										0.06			0.24		
EQT 0035 48										3.45	4.99	15.12			
EQT 0043 29-C										1.54	2.20	2.63			
EQT 0044 98-07										0.12			0.52		
EQT 0045 98-08										<0.01			<0.01		
EQT 0046 99-10										0.07			0.31		
EQT 0047 99-11										0.07			0.31		
EQT 0048 2001-1										0.13	0.19	0.57			
EQT 0049 2001-4	5.87	7.04	25.70	3.89	4.67	17.03	0.35	0.42	1.52	0.02	0.08	3.56	4.27	15.58	
EQT 0079 2009-01	4.94	5.93	3.61	5.88	7.06	4.29	0.45	0.54	0.33	0.04	0.03	0.01	0.01	0.01	

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 92534 - Hexlon Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-V4
Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM 10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Formaldehyde I, II, III Plants & Methanol Tank Farm															
EQT 0080 SAMPLING															0.18
EQT 0081 INSPECTIONS															0.19
EQT 0082 SUMPS															0.19
EQT 0083 WASHDOWN															0.19
FUG 0001 87-03															0.41
FUG 0002 87-04	<0.01	<0.01	<0.01												1.79
FUG 0003 89-03	<0.01	<0.01	<0.01												0.18
FUG 0004 2001-2															0.78
															0.08
															0.33
															0.94
															4.09

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EOT 0002 75-1	Formaldehyde	<0.001		<0.01
	Methanol	0.01		<0.01
EQT 0003 75-2	Formaldehyde	<0.001		<0.01
	Methanol	0.01		<0.01
EOT 0007 75-5 A	Formaldehyde	0.13	0.66	0.57
	Methanol	0.08	0.42	0.36
EOT 0008 75-5 B	Methanol	0.20	2.11	0.90
EOT 0011 78-6	Formaldehyde	0.01		0.02
	Methanol	0.11		0.50
EQT 0017 85-01	Formaldehyde	0.15	0.18	0.64
	Methanol	0.76	0.91	3.31
EQT 0025 85-09	Formaldehyde	<0.001		<0.01
	Methanol	<0.01		0.01
EOT 0026 85-10	Formaldehyde	<0.001		<0.01
	Methanol	0.001		0.01
EQT 0027 89-02	Formaldehyde	0.33	0.40	1.45
	Methanol	0.76	0.91	3.31
EQT 0029 95-26	Formaldehyde	0.02	0.02	0.08
	Methanol	0.34	0.34	1.50
EQT 0030 95-27	Formaldehyde	0.02	0.02	0.08
	Methanol	0.34	0.34	1.49
EQT 0031 95-28	Formaldehyde	0.02	0.02	0.08
	Methanol	0.34	0.34	1.49
EOT 0032 85-63	Sulfuric acid	<0.001		<0.01
EQT 0033 95-64	Formaldehyde	0.09	0.09	0.37
	Methanol	0.001	0.001	0.01
EQT 0034 4	Formaldehyde	0.003		0.01
	Methanol	0.001		0.23
EQT 0035 46	Methanol	3.45	4.99	15.12
EQT 0043 29-C	Methanol	1.54	2.20	2.63
EQT 0044 98-07	Formaldehyde	0.01		0.02
	Methanol	0.11		0.50
EQT 0045 98-08	Formaldehyde	<0.01		<0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0045 98-08	Methanol	<0.01		<0.01
EQT 0046 99-10	Formaldehyde	<0.01		0.01
	Methanol	0.07		0.29
EQT 0047 99-11	Formaldehyde	<0.01		0.01
	Methanol	0.07		0.29
EQT 0048 2001-1	Formaldehyde	0.08	0.11	0.33
	Methanol	0.05	0.08	0.23
EQT 0049 2001-4	Formaldehyde	0.35	0.42	1.52
	Methanol	0.04	0.04	0.16
EQT 0079 2009-01	Formaldehyde	0.34	0.41	0.25
	Methanol	0.10	0.13	0.08
EQT 0080 SAMPLING	Formaldehyde			0.15
	Methanol			0.03
EQT 0081 INSPECTIONS	Formaldehyde			0.18
	Methanol			0.01
EQT 0082 SUMPS	Formaldehyde			0.18
	Methanol			0.01
EQT 0083 WASHDOWN	Formaldehyde			0.18
	Methanol			0.01
FUG 0001 87-03	Formaldehyde	0.11	0.11	0.48
	Methanol	0.30	0.30	1.31
FUG 0002 87-04	Formaldehyde	0.12	0.12	0.52
	Methanol	0.04	0.04	0.18
FUG 0003 89-03	Formaldehyde	0.05	0.05	0.21
	Methanol	0.03	0.03	0.12
FUG 0004 2001-2	Formaldehyde	0.21	0.21	0.91
	Methanol	0.73	0.73	3.19
UNF 0001 AI92534	Formaldehyde			8.25
	Methanol			37.28
	Sulfuric acid			<0.01

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-V4
 Air - Title V Regular Permit Renewal

CRG 0001 FUG - Fugitives Common Requirements

Group Members: FUG 0001 FUG 0002 FUG 0003 FUG 0004

- 1 [40 CFR 63.162(c)] Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H. [40 CFR 63.162(c)] Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification may be removed after the equipment is repaired, except for valves or for connectors subject to 40 CFR 63.174(c)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(e)(1)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(l)] Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 2.1 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(e) through (l). If a reading of 10,000 ppm (phase I); or 5,000 ppm (phase II); or 5,000 ppm (phase III; all other pumps) or greater is recorded, a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)] Which Months: All Year Statistical Basis: None specified Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)] Which Months: All Year Statistical Basis: None specified Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)] Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if, in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)] Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(1)] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid service. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(2)] Pumps in light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(3)]
- 2 [40 CFR 63.162(l)]
- 3 [40 CFR 63.163(b)(1)]
- 4 [40 CFR 63.163(b)(3)]
- 5 [40 CFR 63.163(c)]
- 6 [40 CFR 63.163(d)(2)]
- 7 [40 CFR 63.163(d)(4)]
- 8 [40 CFR 63.163(e)(1)]
- 9 [40 CFR 63.163(e)(2)]
- 10 [40 CFR 63.163(e)(3)]

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-V4
 Air - Title V Regular Permit Renewal

CRG 0001 FUG - Fugitives Common Requirements

- 11 [40 CFR 63.163(e)(4)] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(4)]
- Which Months: All Year Statistical Basis: None specified
- 12 [40 CFR 63.163(e)(6)(i)] Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)(i)]
- 13 [40 CFR 63.163(e)(6)] Pumps in light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)]
- 14 [40 CFR 63.163(e)] Pumps in light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirement in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)]
- Which Months: All Year Statistical Basis: None specified
- 15 [40 CFR 63.165(a)] Pressure relief device in gas/vapor service: Organic HAP < 500 ppm above background except during pressure releases, as determined by the method specified in 63.180(c). Subpart H. [40 CFR 63.165(a)]
- Which Months: All Year Statistical Basis: None specified
- 16 [40 CFR 63.165(b)(1)] Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- 17 [40 CFR 63.165(b)(2)] Pressure relief devices in gas/vapor service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]
- Which Months: All Year Statistical Basis: None specified
- 18 [40 CFR 63.165(d)(2)] Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.165(a) and (b). Subpart H. [40 CFR 63.165(d)(2)]
- 19 [40 CFR 63.166] Sampling connection systems: Equip with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.
- 20 [40 CFR 63.167] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

CRG 0001 FUG - Fugitives Common Requirements

- 21 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- 22 [40 CFR 63.168(c)] Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- 23 [40 CFR 63.168(d)(1)] Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service or light liquid service (Phase III, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]
- 24 [40 CFR 63.168(d)(2)] Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (d)(4). As a voluntary emission reduction beginning April 2006, Hexion has elected to monitor valves in gas/vapor/light service once every quarter. Subpart H. [40 CFR 63.168(d)(2)]
- 25 [40 CFR 63.168(e)(1)] Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.168(e)(1)]
- 26 [40 CFR 63.168(f)(3)] Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(f)(3)]
- 27 [40 CFR 63.168(f)] Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.168(f)]
- 28 [40 CFR 63.168(h)(1)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(1)]
- 29 [40 CFR 63.168(h)(2)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(2)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-V4
 Air - Title V Regular Permit Renewal

CRG 001 FUG - Fugitives Common Requirements

- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(1)]
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the valves at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(3)]
- Which Months: All Year Statistical Basis: None specified
 Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service. Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps (including pumps in food/mechanical service), or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
- Which Months: All Year Statistical Basis: None specified
 Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service. Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]
- Closed-vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(i)]
- Which Months: All Year Statistical Basis: None specified
 Closed-vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). As a voluntary emission reduction, Hexton performs Method 21 monitoring annually on the CVS. Subpart H. [40 CFR 63.172(f)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
 Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(i)]
- Which Months: All Year Statistical Basis: None specified
 Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
 Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.172(i). Subpart H. [40 CFR 63.172(h)]
- Closed-vent system (bypass lines): Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart H. [40 CFR 63.172(j)(2)]

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
Activity Number: PER20090003
Permit Number: 2019-V4
Air - Title V Regular Permit Renewal

CRG 0001 FUG - Fugitives Common Requirements

- 40 [40 CFR 63.172(j)(2)] Closed-vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart H. [40 CFR 63.172(j)(2)]
- 41 [40 CFR 63.172(k)(1)] Which Months: All Year Statistical Basis: None specified
- Closed-vent system (unsafe-to-inspect): Demonstrate that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential dangers as a consequence of complying with 40 CFR 63.172(l)(1) or (l)(2). Comply with this requirement instead of the requirement in 40 CFR 63.172(l)(1) and (l)(2). Subpart H. [40 CFR 63.172(k)(1)]
- 42 [40 CFR 63.172(k)(2)] Closed-vent system (unsafe-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 63.172(l)(1) and (l)(2). Subpart H. [40 CFR 63.172(k)(2)]
- 43 [40 CFR 63.172(l)(1)] Which Months: All Year Statistical Basis: None specified
- Closed-vent system (difficult-to-inspect): Demonstrate that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(1)]
- 44 [40 CFR 63.172(l)(2)] Closed-vent system (difficult-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Maintain a written plan that requires inspection of the equipment at least once every five years. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(2)]
- 45 [40 CFR 63.172(m)] Which Months: All Year Statistical Basis: None specified
- Ensure that the closed-vent system or control device is operating whenever organic HAP emissions are vented to the closed-vent system or control device. Subpart H. [40 CFR 63.172(m)]
- 46 [40 CFR 63.173(a)] Agitators in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(a)]
- 47 [40 CFR 63.173(b)] Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar) for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(b)]
- 48 [40 CFR 63.173(c)] Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(c)]
- 49 [40 CFR 63.173(d)(1)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the agitator stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(1)]

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- 50 [40 CFR 63.173(d)(2)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid organic HAP service. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(2)]
- 51 [40 CFR 63.173(d)(3)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(3)]
- 52 [40 CFR 63.173(d)(4)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the agitator seal. If there are indications of liquid dripping from the agitator seal at the time of the weekly inspection, monitor the agitator as specified in 40 CFR 63.180(b) to determine the presence of organic HAP in the barrier fluid. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a)
- Subpart H. [40 CFR 63.173(d)(4)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)(i)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)]
- Agitators in gas/vapor service or light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the agitator is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.173(d)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each agitator as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirement of 40 CFR 63.173(b)(1) and (d)(4), and the daily requirements of 40 CFR 63.173(d)(5). Subpart H. [40 CFR 63.173(g)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the agitator cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d) Subpart H. [40 CFR 63.173(h)(1)]
- Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the agitator at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(3)]
- Which Months: All Year Statistical Basis: None specified
- 56 [40 CFR 63.173(g)]
- 57 [40 CFR 63.173(h)(1)]
- 58 [40 CFR 63.173(h)(3)]

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- 59 [40 CFR 63.173(j)(1)] Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the agitator is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.173(a) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(1)]
- 60 [40 CFR 63.173(j)(2)] Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the agitator as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(2)]
- Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within 12 months after the compliance date, except as provided in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(1)]
- Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.174(b)(3)(i)]
- Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]
- Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]
- Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Comply with the requirements of 40 CFR 63.169. Subpart H. [40 CFR 63.174(c)(2)(i)]
- Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Organic HAP monitored by technically sound method within three months after being returned to organic HAP service after having been opened or otherwise had the seal broken. If monitoring detects a leak, implement repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(c)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]
- Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (c). Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(j)(1)]

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69 [40 CFR 63.174(n)(2)]

Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(2)]

Which Months: All Year Statistical Basis: None specified

Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d). Comply with this requirement instead of the requirements in 40 CFR 63.174(a), (d), and (e). Subpart H. [40 CFR 63.174(g)]

Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Comply with this requirement instead of the monitoring requirements of 40 CFR 63.174(a) and (c) and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182. Subpart H. [40 CFR 63.174(h)(2)]

Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(j)]

Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.181(a) through (k). Subpart H.

Submit Initial Notification: Due within 120 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(b)(1). Subpart H. [40 CFR 63.182(b)]

Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]

Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)]

Equip all rotary pumps and compressors with mechanical seals.

70 [40 CFR 63.174(g)]

71 [40 CFR 63.174(h)(2)]

72 [40 CFR 63.174(i)]

73 [40 CFR 63.180]

74 [40 CFR 63.181]

75 [40 CFR 63.182(b)]

76 [40 CFR 63.182(c)]

77 [40 CFR 63.182(d)]

78 [LAC 33:III.2111]

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79 [LAC 33:III.5109.A]

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emission programs.

a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.

b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedule.

c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Fugitive emissions from the facility are subject to LAC 33:III.2122, LAC 33:III. Chapter 51 (State MACT), 40 CFR 60 Subpart VV, and 40 CFR 63 Subpart H. Hexion shall comply with these regulations by complying with the most stringent program, 40 CFR 63 Subpart H, as specified in the Louisiana Fugitive Emission Program Consolidation Guidelines.

CRG 0002 HONG2 - HON Group 2 Tanks Common Requirements

Group Members: EQT 0005EQT 0006EQT 0010EQT 0011EQT 0013EQT 0014EQT 0015EQT 0016EQT 0018EQT 0019EQT 0021EQT 0022EQT 0023EQT 0024EQT 0078

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]
 Vents to Formaldehyde Storage Tank Scrubber, EQT048, for emission control. Determined as MACT.

CRG 0003 MACT - MACT Common Requirements

Group Members: EQT 0011EQT 0034EQT 0044EQT 0045EQT 0046EQT 0047EQT 0048EQT 0081EQT 0082EQT 0083

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. No additional control - Determined as MACT.

CRG 0004 HONG1 - HON Group 1 Tanks Common Requirements

Group Members: EQT 0036EQT 0037EQT 0038EQT 0039EQT 0040EQT 0041EQT 0042

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CRG 0004 HONG1 - HON Group 1 Tanks Common Requirements

- Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
- Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]
- G. [40 CFR 63.122(a)(3)]
- Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(j), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]
- Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group I status and is in operation. Subpart G.
- Equip with a submerged fill pipe.

EQT 0002 75-1 - Methanol Feed Tank 9003 (Formaldehyde I Plant)

- 91 [LAC 33.III.2103.A] Equip with a submerged fill pipe.
- 92 [LAC 33.III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33.III.2103.I.1 - 7, as applicable.
- 93 [LAC 33.III.5109] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by Shall comply with all applicable requirements of LAC 33.III.2103 - Determined as MACT.

EQT 0003 75-2 - Recycle Methanol Feed Tank 9001 (Formaldehyde I Plant)

- 94 [LAC 33.III.2103.A] Equip with a submerged fill pipe.
- 95 [LAC 33.III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33.III.2103.I.1 - 7, as applicable.
- 96 [LAC 33.III.5109] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by Shall comply with all applicable requirements of LAC 33.III.2103 - Determined as MACT.

EQT 0004 75-3 - Raw Formaldehyde Tank 9005 (Formaldehyde I Plant)

- 97 [LAC 33.III.2103.A] Equip with a submerged fill pipe.
- 98 [LAC 33.III.5109] Vents to Formaldehyde Storage Tank Scrubber, EIQ 48, for emission control. Determined as MACT.

SPECIFIC REQUIREMENTS

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EQT 0007 75-5 A - Formaldehyde Plant - Formaldehyde Rail/Truck Loading

Equip with a vapor collection system and control device. Subpart G. [40 CFR 63.126(a)]

Organic HAP \geq 98 % reduction by weight or exit concentration \leq 20 ppmv, whichever is less stringent, using a control device. Subpart G. [40 CFR 63.126(b)(1)]

Which Months: All Year Statistical Basis: None specified

Load organic HAPs into only tank trucks and railcars which have a current certification in accordance with the U.S. Department of Transportation pressure test requirements of 49 CFR part 180 for tank trucks and 49 CFR 173.31 for railcars; or have been demonstrated to be vapor-tight within the preceding 12 months, as determined by the procedures in 40 CFR 63.128(f). Subpart G. [40 CFR 63.126(e)]

Load organic HAPs to only tank trucks or railcars equipped with vapor collection equipment that is compatible with the transfer rack's vapor collection system. Subpart G. [40 CFR 63.126(f)]

Load organic HAPs to only tank trucks or railcars whose collection systems are connected to the transfer rack's vapor collection systems. Subpart G. [40 CFR 63.126(g)]

Ensure that no pressure-relief device in the transfer racks' vapor collection system or in the organic HAPs loading equipment of each tank truck or railcar shall begin to open during loading. Subpart G. [40 CFR 63.126(h)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.130(e) and (f). Subpart G. Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply 40 CFR 63 Subpart G - Determined as MACT.

EQT 0008 75-5 B - Formaldehyde Plant - Methanol Rail/Truck Loading

Equip with a vapor collection system and control device. Subpart G. [40 CFR 63.126(a)]

Organic HAP \geq 98 % reduction by weight or exit concentration \leq 20 ppmv, whichever is less stringent, using a control device. Subpart G. [40 CFR 63.126(b)(1)]

Which Months: All Year Statistical Basis: None specified

Load organic HAPs into only tank trucks and railcars which have a current certification in accordance with the U.S. Department of Transportation pressure test requirements of 49 CFR part 180 for tank trucks and 49 CFR 173.31 for railcars; or have been demonstrated to be vapor-tight within the preceding 12 months, as determined by the procedures in 40 CFR 63.128(f). Subpart G. [40 CFR 63.126(e)]

Load organic HAPs to only tank trucks or railcars equipped with vapor collection equipment that is compatible with the transfer rack's vapor collection system. Subpart G. [40 CFR 63.126(f)]

Load organic HAPs to only tank trucks or railcars whose collection systems are connected to the transfer rack's vapor collection systems. Subpart G. [40 CFR 63.126(g)]

Ensure that no pressure-relief device in the transfer racks' vapor collection system or in the organic HAPs loading equipment of each tank truck or railcar shall begin to open during loading. Subpart G. [40 CFR 63.126(h)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.130(e) and (f). Subpart G.

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EQT 0015 80-4 - Formaldehyde Product Tank C 9208 (Formaldehyde II Plant)

- Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group I status and is in operation. Subpart G.

EQT 0017 85-01 - Off Gas Vent (Formaldehyde II Plant)

- Organic HAP \geq 98 % reduction by weight, or \leq 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c).
 Subpart G. [40 CFR 63.113(a)(2)]
 Which Months: All Year Statistical Basis: None specified
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
 Temperature monitored by continuous recorder continuously at the inlet and outlet of the catalyst bed.
 Which Months: All Year Statistical Basis: Not applicable
 Controlled using a catalytic oxidizer to 98% efficiency. This is MACT.

EQT 0018 85-02 - Formaldehyde Product Tank 9209 (Formaldehyde II Plant)

- Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group I status and is in operation. Subpart G.

EQT 0025 85-09 - Methanol Scrubber Water Tank 9302

- Comply with the requirements of 40 CFR 63 Subparts F and G.
 Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records specified in 40 CFR 63.103(c)(2)(i) through (iii), as well as records specified in 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(c)(2)]

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EQT 0025 85-09 - Methanol Scrubber Water Tank 9302

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable provisions of 40 CFR 63 Subpart G - Determined as MACT.

EQT 0026 85-10 - Methanol Scrubber Water Tank 9303

- 126 [40 CFR 63.100]
 127 [40 CFR 63.103(c)(1)]
 Comply with the requirements of 40 CFR 63 Subparts F and G.
 Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records specified in 40 CFR 63.103(c)(2)(i) through (iii), as well as records specified in 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(c)(2)]
 Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable provisions of 40 CFR 63 Subpart G - Determined as MACT.

EQT 0027 89-02 - Off Gas Vent (Formaldehyde III Plant)

- Organic HAP \geq 98 % reduction by weight, or \leq 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c).
 Subpart G. [40 CFR 63.113(a)(2)]
 Which Months: All Year Statistical Basis: None specified
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
 Temperature monitored by continuous recorder continuously at the inlet and outlet of the catalyst bed.
 Which Months: All Year Statistical Basis: Not applicable
 Controlled using a catalytic oxidizer to 95% efficiency. This is MACT.

EQT 0028 95-23 - Wash Water Tank 9006 (Formaldehyde I Plant)

- 134 [LAC 33:III.5109] Vents to Formaldehyde Storage Tank Scrubber, Emission Point 48, for emission control. Determined as MACT.

EQT 0029 95-26 - Cooling Tower CT-9103

- 135 [40 CFR 63.104(b)] Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b)]
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-V4
 Air - Title V Regular Permit Renewal

EQT 0029 95-26 - Cooling Tower CT-9103

- Heat exchange systems: Maintain, at all times, the monitoring plan currently in use. Maintain on-site, or accessible from a central location by computer or other means that provide access within 2 hours after a request. If a monitoring plan is superseded, retain the most recent superseded plan at least until 5 years from the date of its creation. Retain the superseded plan on-site (or accessible from a central location by computer or other means that provides access within 2 hours after a request) for at least 6 months after its creation. Subpart F. [40 CFR 63.104(c)(3)]
- Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d)]
- Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy continuously. Retain the records identified in 40 CFR 63.104(f)(1) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]
- Shall comply with all applicable provisions of 40 CFR 63 Subpart F - Determined as MACT.

EQT 0030 95-27 - Cooling Tower CT-9101

- Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more specified HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b)]
- Which Months: All Year Statistical Basis: None specified
- Heat exchange systems: Maintain, at all times, the monitoring plan currently in use. Maintain on-site, or accessible from a central location by computer or other means that provide access within 2 hours after a request. If a monitoring plan is superseded, retain the most recent superseded plan at least until 5 years from the date of its creation. Retain the superseded plan on-site (or accessible from a central location by computer or other means that provides access within 2 hours after a request) for at least 6 months after its creation. Subpart F. [40 CFR 63.104(c)(3)]
- Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d)]
- Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy continuously. Retain the records identified in 40 CFR 63.104(f)(1) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]
- Shall comply with all applicable provisions of 40 CFR 63 Subpart F - Determined as MACT.

EQT 0031 95-28 - Cooling Tower CT-9102

- Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more specified HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

EQT 0031 95-28 - Cooling Tower CT-9102

Heat exchange systems: Maintain, at all times, the monitoring plan currently in use. Maintain on-site, or accessible from a central location by computer or other means that provide access within 2 hours after a request. If a monitoring plan is superseded, retain the most recent superseded plan at least until 5 years from the date of its creation. Retain the superseded plan on-site (or accessible from a central location by computer or other means that provides access within 2 hours after a request) for at least 6 months after its creation. Subpart F. [40 CFR 63.104(c)(3)]

Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d)]

Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy continuously. Retain the records identified in 40 CFR 63.104(D)(1)(i) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]
Shall comply with all applicable provisions of 40 CFR 63 Subpart F - Determined as MACT.

EQT 0033 95-64 - Formaldehyde Plant Sumps

Maintenance wastewater: Implement the procedures described in 40 CFR 63.105(b) and (c) as part of the start-up, shutdown and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(d)]

Maintenance wastewater: Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain a record of the information required by 40 CFR 63.105(b) and (c) as part of the start-up, shut-down, and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(e)]

Maintenance wastewater: Prepare a description of maintenance procedures for the management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair and during periods which are not shutdowns as specified in 40 CFR 63.105(b)(1) through (b)(3). Modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. Subpart F.

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply 40 CFR 63 Subpart G - Determined as MACT.

EQT 0035 48 - Tank Farm - Methanol Storage Tanks Scrubber

Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]

Inlet emissions: Organic HAP >= 95 % reduction, except as provided in 40 CFR 63.119(e)(2). If a flare is used, it shall meet the specifications described in the general control device requirements of 40 CFR 63.11(b). Subpart G. [40 CFR 63.119(e)(1)]
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

EQT 0035 48 - Tank Farm - Methanol Storage Tanks Scrubber

- Inlet emissions: Organic HAP $\geq 90\%$ reduction, if it can be demonstrated that the control device installed on a storage vessel on or before December 31, 1992 is designed to reduce inlet emissions of total organic HAP by greater than or equal to 90 percent but less than 95 percent.
- Subpart G. [40 CFR 63.119(e)(2)]
- Which Months: All Year Statistical Basis: None specified
- Do not exceed 240 hours per year of periods of planned routine maintenance of the control device, during which the control device does not meet the specifications of 40 CFR 63.119(e)(1) or (e)(2). Subpart G. [40 CFR 63.119(e)(3)]
- Prepare a design evaluation, which includes the information specified in 40 CFR 63.120(d)(1)(i), or submit the results of a performance test as described in 40 CFR 63.120(d)(1)(ii). Subpart G. [40 CFR 63.120(d)(1)]
- Monitor the parameters specified in the Notification of Compliance Status required in 40 CFR 63.120(d)(1)
- and maintain the control device such that the monitored parameters remain within the ranges specified in the Notification of Compliance Status.
- Subpart G. [40 CFR 63.120(d)(5)]
- Submit, as part of the Notification of Compliance Status required by 40 CFR 63.151(b): A monitoring plan containing the information specified in 40 CFR 63.120(d)(2)(i) and in either (d)(2)(ii) or (d)(2)(iii); and the information specified in 40 CFR 63.120(d)(3)(i) and, if applicable, (d)(3)(ii). Subpart G. [40 CFR 63.120(d)]
- Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]
- Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
- Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(3)]
- Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(4)]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.129(a) through (f). Subpart G.
- Vapor collection system or closed vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(1)(i)]
- Which Months: All Year Statistical Basis: None specified
- Vapor collection system or closed vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually.
- Subpart G. [40 CFR 63.148(b)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Fixed roof, cover, or enclosure: Presence of a leak monitored by visual, audible, and/or olfactory once initially and once every six months as specified in 40 CFR 63.133 through 63.137. Subpart G. [40 CFR 63.148(b)(3)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

EQT 0035 48 - Tank Farm - Methanol Storage Tanks Scrubber

Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 63.148(f)(2)]

Which Months: All Year Statistical Basis: None specified

Equip with a submerged fill pipe.

Scrubber water flow rate shall be manually checked prior to loading. An audible alarm shall sound and the loading pumps shall automatically shut off in the event water flow falls below the specified minimum Flow rate ≥ 3.00 gallons/min.

Which Months: All Year Statistical Basis: None specified

EQT 0043 29-C - Methanol Loading - Barge

HAP $\geq 97\%$ reduction by weight from marine tank vessel loading operations, as determined using methods in 40 CFR 63.565 (d) and (l).

Subpart Y. [40 CFR 63.562(b)(2)]

Which Months: All Year Statistical Basis: None specified

Operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction. Subpart Y. [40 CFR 63.562(e)]

Determine compliance with the emission limits under 40 CFR 63.562(b), (c), and (d) using the procedures specified in 40 CFR 63.563(b)(1) through (b)(10), as applicable. Subpart Y. [40 CFR 63.563(b)]

Determine compliance with 40 CFR 63 Subpart Y using the test methods and procedures specified in 40 CFR 63.565(a) through (m), as applicable. Subpart Y. [40 CFR 63.565(a)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.567(g), (j) and (k), as applicable. Subpart Y. [40 CFR 63.567(g)]

Flow rate recordkeeping by electronic or hard copy once every four hours.

Flow rate monitored by flow rate monitoring device once every four hours.

Which Months: All Year Statistical Basis: None specified

EQT 0048 2001-1 - Formaldehyde Storage Tanks Scrubber

Inlet emissions: Organic HAP $\geq 95\%$ reduction, except as provided in 40 CFR 63.119(e)(2). If a flare is used, it shall meet the specifications described in the general control device requirements of 40 CFR 63.11(b). Subpart G. [40 CFR 63.119(e)(1)]

Which Months: All Year Statistical Basis: None specified

Inlet emissions: Organic HAP $\geq 90\%$ reduction, if it can be demonstrated that the control device installed on a storage vessel on or before December 31, 1992 is designed to reduce inlet emissions of total organic HAP by greater than or equal to 90 percent but less than 95 percent. Subpart G. [40 CFR 63.119(e)(2)]

Which Months: All Year Statistical Basis: None specified

Do not exceed 240 hours per year of periods of planned routine maintenance of the control device, during which the control device does not meet the specifications of 40 CFR 63.119(e)(1) or (e)(2). Subpart G. [40 CFR 63.119(e)(3)]

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexlon Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-V4
 Air - Title V Regular Permit Renewal

EQT 0048 2001-1 - Formaldehyde Storage Tanks Scrubber

- Prepare a design evaluation, which includes the information specified in 40 CFR 63.120(d)(1)(i), or submit the results of a performance test as described in 40 CFR 63.120(d)(1)(ii). Subpart G. [40 CFR 63.120(d)(1)]
- Monitor the parameters specified in the Notification of Compliance Status required in 40 CFR 63.15(b) or in the operating permit and operate and maintain the control device such that the monitored parameters remain within the ranges specified in the Notification of Compliance Status. Subpart G. [40 CFR 63.120(d)(5)]
- Submit, as part of the Notification of Compliance Status required by 40 CFR 63.151(b): A monitoring plan containing the information specified in 40 CFR 63.120(d)(2)(i) and in either (d)(2)(ii) or (d)(2)(iii); and the information specified in 40 CFR 63.120(d)(3)(i) and, if applicable, (d)(3)(ii). Subpart G. [40 CFR 63.120(d)]
- Vent system: Secure each valve in the vent system that would divert the vent stream to the atmosphere in a non-diverting position using a car seal or a lock-and-key type configuration; or equip with a flow indicator. Subpart G. [40 CFR 63.126(i)]
- Vent system: Seal or closure mechanism monitored by visual inspection/determination monthly to ensure that the valve is maintained in the closed position and the vent stream is not diverted through the by-pass line. Subpart G. [40 CFR 63.127(d)(2)(1)]
- Which Months: All Year Statistical Basis: None specified
- Vent system: If car-seal has been broken or valve position changed, record that the vent stream has been diverted. Return the car-seal or lock-and-key combination to the secured position as soon as practicable but not later than 15 calendar days after the change in position is detected. Subpart G. [40 CFR 63.127(d)(2)(ii)]
- Vent system: Secure the by-pass line valve in the closed position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR 63.127(d)(2)]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.129(a) through (f). Subpart G.
- Vapor collection system or closed vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(1)(i)]
- Which Months: All Year Statistical Basis: None specified
- Vapor collection system or closed vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(i)]
- Which Months: All Year Statistical Basis: None specified
- Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Vapor collection system or closed vent system (ductwork): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(2)(iii)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexlon Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-v4
 Air - Title V Regular Permit Renewal

EQT 0048 2001-1 - Formaldehyde Storage Tanks Scrubber

- Fixed roof, cover, or enclosure: Presence of a leak monitored by visual, audible, and/or olfactory once initially and once every six months as specified in 40 CFR 63.133 through 63.137. Subpart G. [40 CFR 63.148(b)(3)]
 Which Months: All Year Statistical Basis: None specified
 Repair leaks (as indicated by an instrument reading greater than 500 ppm above background or by visual inspections) as soon as practicable, except as provided in 40 CFR 63.148(e). Make a first attempt at repair no later than 5 calendar days after the leak is detected. Complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.148(d)(3). Subpart G. [40 CFR 63.148(d)]
 Vapor collection system or closed vent system (bypass lines): Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR 63.148(f)(2)]
 Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 63.148(f)(2)]
 Which Months: All Year Statistical Basis: None specified
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). Subpart G. [40 CFR 63.148(i)]
 Submit the information specified in 40 CFR 63.148(j)(1) through (j)(3) with the reports required by 40 CFR 63.182(b) of subpart H or 40 CFR 63.152(c). Subpart G. [40 CFR 63.148(j)]

- Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33.III.2103.I.1 - 7, as applicable.
 Flow rate recordkeeping by electronic or hard copy once every 15 minutes.
 Flow <= 2.00 gallons/min.
 Which Months: All Year Statistical Basis: None specified
 Control emissions of toxic air pollutants to a degree that constitutes MACT. Shall comply with all applicable provisions of 40 CFR 63 Subpart G.

EQT 0049 2001-4 - Boiler

- Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c).
 For combustion devices, calculate emission reduction or concentration on a dry basis, corrected to 3-percent oxygen. Subpart G. [40 CFR 63.113(a)(2)]
 Which Months: All Year Statistical Basis: None specified
 Introduce the vent stream from a Group I process vent into the flame zone. Subpart G. [40 CFR 63.113(b)]
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
 Vapor collection system or closed vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(1)(i)]
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
 Activity Number: PER20090003
 Permit Number: 2019-V4
 Air - Title V Regular Permit Renewal

EQT 0049 2001-4 - Boiler

- 210 [40 CFR 63.148(b)(1)(iii)]
 Vapor collection system or closed vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually.
 Subpart G. [40 CFR 63.148(b)(1)(ii)]
 Which Months: All Year Statistical Basis: None specified
 Vapor collection system or closed vent system (ductwork): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(2)(iii)]
 Which Months: All Year Statistical Basis: None specified
 Repair leaks (as indicated by an instrument reading greater than 500 ppm above background or by visual inspections) as soon as practicable, except as provided in 40 CFR 63.148(e). Make a first attempt at repair no later than 5 calendar days after the leak is detected. Complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.148(d)(3). Subpart G. [40 CFR 63.148(d)]
 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
 Which Months: All Year Statistical Basis: None specified
 Total suspended particulate <= 0.6 lb/MMBTU of heat input.
 Which Months: All Year Statistical Basis: None specified
 Comply with applicable HON provisions. Determined as MACT.

EQT 0050 2001-5 - Formaldehyde Product Tank D 9214 (Formaldehyde I Plant)

- Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group I status and is in operation. Subpart G.

EQT 0079 2009-01 - T-Flare

- 218 [40 CFR 63.113(a)(1)(i)]
 Comply with the provisions of 40 CFR 63.11(b). Subpart G. [40 CFR 63.113(a)(1)(i)]
 Presence of a flame monitored by the regulation's specified method(s) continuously. Subpart G. [40 CFR 63.114(a)(2)]
 Which Months: All Year Statistical Basis: None specified
 Conduct a visible emission test using the techniques specified in 40 CFR 63.11(b)(4). Subpart G. [40 CFR 63.116(a)(1)]
 Determine the net heating value of the gas being combusted using the techniques specified in 40 CFR 63.11(b)(6). Subpart G. [40 CFR 63.116(a)(2)]
 Determine the exit velocity using the techniques specified in either 40 CFR 63.11(b)(7)(i) or 63.11(b)(8), as appropriate. Subpart G. [40 CFR 63.116(a)(3)]

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexton Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER200900003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

EQT 0079 2009-01 - T-Flare

- 223 [40 CFR 63.118(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.118(a)(1) through (a)(4). Subpart G. [40 CFR 63.118(a)]
 Semianual reports time and durations of all periods when pilot flame of flare is absent. [40 CFR 63.118(f)(5)]
- 224 [40 CFR 63.118(f)(5)] Vapor collection system or closed vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(1)(i)]
- 225 [40 CFR 63.148(b)(1)(i)] Which Months: All Year Statistical Basis: None specified
 Vapor collection system or closed vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(1)(ii)]
- 226 [40 CFR 63.148(b)(1)(ii)] Which Months: All Year Statistical Basis: None specified
 Repair leaks (as indicated by an instrument reading greater than 500 ppm above background or by visual inspections) as soon as practicable, except as provided in 40 CFR 63.148(e). Make a first attempt at repair no later than 5 calendar days after the leak is detected. Complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.148(d)(3). Subpart G. [40 CFR 63.148(d)]
 Opacity <= 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets.

- 227 [40 CFR 63.148(d)] Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 228 [LAC 33:III.1105] Which Months: All Year Statistical Basis: Six-minute average
 Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with 40 CFR 63.11(b) - Determined as MACT.

EQT 0084 ABSORBER - Absorber (Formaldehyde I Plant)

- 229 [LAC 33:III.1311.C] Reduce Organic HAP using a flare or Organic HAP \geq 98 % reduction by weight, or <= 20 ppmy, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). Subpart G. [40 CFR 63.113(a)(2)]
- 230 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified
 Bypass lines: Seal or closure mechanism monitored by visual inspection/determination monthly to ensure that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 63.114(d)(2)]
- 231 [40 CFR 63.113(a)(2)] Which Months: All Year Statistical Basis: None specified
 Bypass lines: Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR 63.114(d)(2)]
- 232 [40 CFR 63.114(d)(2)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]

UNF 0001 AI92534 - Formaldehyde I, II, III Plants & Methanol Tank Farm

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant

Activity Number: PER20090003

Permit Number: 2019-V4

Air - Title V Regular Permit Renewal

UNF 0001 AI92534 - Formaldehyde I, II, III Plants & Methanol Tank Farm

235 [40 CFR 60]

236 [40 CFR 61]

237 [40 CFR 63.103(c)(1)]

238 [40 CFR 63.103(c)(2)]

239 [40 CFR 63.105(e)]

All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.

All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.

Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records specified in 40 CFR 63.103(c)(2)(i) through (iii), as well as records specified in 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(c)(2)] Maintenance wastewater. Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain a record of the information required by 40 CFR 63.105(b) and (c) as part of the start-up, shut-down, and malfunction plan required under 40 CFR 63.6(e)(3).

Subpart F. [40 CFR 63.105(e)]

All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in 40 CFR 63 Subparts F, G, and H. Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.

Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.

Submit permit application. Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III Chapter 5.

Submit a timely and complete permit application to the Office of Environmental Services as required in accordance with the procedures in LAC 33:III.Chapter 5.

No construction, modification, or operation of a facility which ultimately may result in an initiation or increase in emission of air contaminants as defined in LAC 33:III.11 shall commence until the permit application has been approved, an appropriate permit fee paid (in accordance with LAC 33:III.Chapter 2), and a permit (certificate of approval) has been issued by the permitting authority. Operate the source in accordance with all terms and conditions of this permit.

Comply with terms and conditions incorporated in the permit to ensure compliance with all state and federally applicable air quality requirements and standards at the source, and such other permit terms and conditions as determined by the permitting authority to be reasonable and necessary. Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.2113.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only).

Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HRVOC), which include 1,3-Butadiene, Butene, cis-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only).

Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
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- 250 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard.
 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 251 [LAC 33:III.5105.A.3] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
- 252 [LAC 33:III.5105.A.4] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 253 [LAC 33:III.5107.A.2] Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 254 [LAC 33:III.5107.A] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 255 [LAC 33:III.5107.B.1] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.
- 256 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931. Submit notification in the manner provided in LAC 33:III.3923.
- 257 [LAC 33:III.5107.B.3] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 258 [LAC 33:III.5107.B.4] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 259 [LAC 33:III.5107.B.5] Shall comply with all applicable provisions of Subchapter M Asbestos.
- 260 [LAC 33:III.5151] Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III. Chapter 5 prior to approval by the permitting authority.

SPECIFIC REQUIREMENTS

AI ID: 92534 - Hexion Specialty Chemicals Inc - Formaldehyde Plant
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Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.

Submit supplementary facts or corrected information: Due promptly upon becoming aware of failure to submit or incorrect submittal regarding permit applications. In addition, provide information as necessary to address any requirements that become applicable to the source after the date of filing a complete application but prior to release of a proposed permit.

Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III.Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.

In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E, Subparagraphs 1-8.

Comply with the Part 70 General Conditions as set forth in LAC 33:III.53.5 and the Louisiana General Conditions as set forth in LAC 33:III.53.7. [LAC 33:III.535, LAC 33:III.537]

Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.

Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.

Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.

Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.1. Tables 5, 6, and 7.

Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.

Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.

Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.